

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

DEFINITION SERVICES INC., a British Virgin Islands corporation,	)	
	)	
Plaintiff,	)	
	)	
v.	)	C.A. No. 1:21 cv-00741-LPS
	)	
GVA CAPITAL LTD., a Cayman Islands exempted company,	)	
	)	
Defendant.	)	

**JOINT LOCAL RULE 81.2 STATEMENT**

Plaintiff Definition Services Inc. (“Definition”) and Plaintiff Defendant GVA Capital Ltd. (“GVA”), by and through their undersigned attorneys, submit this statement pursuant to Local District Court Rule 81.2 identifying pending matters that require judicial action in the above-captioned action.

This action was originally filed in the Delaware Court of Chancery on April 26, 2021. On that date, Definition filed its verified complaint along with motions for expedition and a temporary restraining order. Thereafter, the parties agreed to a stipulated status quo order that was entered by the Court on May 18, 2021. Definition also served requests for the production of documents and interrogatories on GVA on May 21, 2021. On May 25, 2021, GVA removed the case to this Court (D.I. 1). On June 4, 2021, Definition filed a Motion to Remand this matter to the Delaware Court of Chancery (D.I. 4). On June 7, 2021, GVA filed an Answer with Jury Demand to Definition’s Complaint (D.I. 6).

GVA intends to oppose Definition’s Motion to Remand, which will require judicial action of this Court. GVA’s response is due on June 18, 2021 and Definition’s reply is due on

June 25, 2021. GVA anticipates that it will request oral argument on the Motion. At this time, there are no other pending matters requiring judicial action.

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Dated: June 15, 2021